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11 *Attorneys for Plaintiffs and the Proposed Class*

12
13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 IN RE SAN FRANCISCO 49ERS DATA
16 BREACH LITIGATION

17 This Document Relates to:
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19 ALL ACTIONS
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Case No. 3:22-cv-05138

**SECOND JOINT STIPULATION
AND [PROPOSED] ORDER
REGARDING BRIEFING
SCHEDULE FOR PLAINTIFFS'
MOTION TO PRELIMINARILY
APPROVE CLASS ACTION
SETTLEMENT**

Hon. James Donato

Pursuant to Local Rule 6-2, Plaintiffs Samantha Donelson, James Sampson, and Katherine Finch enter the following stipulation with Defendant Forty Niners Football Company LLC.

1. As the parties previously informed the Court, they have reached a class settlement and are in the process of preparing a formal agreement.

2. Plaintiffs' current deadline to file their motion for preliminary approval is May 25, 2023. *See* ECF No. 30 (text only entry).

3. The parties have been working diligently to finalize the settlement agreement and all exhibits; however, the parties are currently in disagreement about one material term of the settlement. The parties agree that a two-week extension is necessary for them to finalize the settlement agreement and exhibits and to resolve the current disagreement, which the parties are on the cusp of doing.

4. Therefore, the parties hereby stipulate that Plaintiffs shall have until June 8, 2023, to file their motion for preliminary approval.

IT IS SO STIPULATED.

Dated: May 25, 2023

/s/ M. Anderson Berry
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Attorney for Defendant

ATTESTATION

I, M. Anderson Berry, attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

Dated: May 25, 2023

/s/ M. Anderson Berry
M. Anderson Berry

[PROPOSED] ORDER

Pursuant to the parties Stipulation above, IT IS SO ORDERED.

DATED: _____

The Honorable James Donato
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served today on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ M. Anderson Berry

M. Anderson Berry, Esq.